

May 13, 2025

VIA ECF

Honorable Kiyo A. Matsumoto, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Greebel*, Case No.: 15-CR-0637 (KAM)

Dear Judge Matsumoto:

We represent Merrill Lynch, Pierce, Fenner & Smith, Inc. (“Merrill Lynch” or “Garnishee”) in connection with the above-captioned action. Pursuant to Rule II.E of Your Honor’s Chambers Practices, Garnishee is writing to request an extension of the deadlines set forth in Your Honor’s Order of Garnishment, dated April 21, 2025 (the “Order”), which was served upon Merrill Lynch by FedEx on May 6, 2025. *See* ECF Nos. 818 and **Exhibit A**.

Pursuant to the Order, Merrill Lynch was directed to take certain actions by May 13, 2025, including to: (i) liquidate any holdings and accrued interest maintained within a retirement brokerage account belonging to Defendant Evan Greebel and held at Merrill Lynch (the “Liquidated Account Balance”); (ii) withhold twenty percent (20%) of the Liquidated Account Balance for payment to the Internal Revenue Service pursuant to 28 U.S.C. § 3405(c)(1)(B); and (iii) submit an accounting evidencing the ordered liquidation and withholding of the Liquidated Account Balance (collectively, the “Ordered Liquidation”). *See* ECF Nos. 818 at p. 4-5. Merrill Lynch was likewise ordered to pay eighty percent (80%) of the Liquidated Account Balance to the Clerk of the Court within five days of the Ordered Liquidation, or by May 19, 2025 (the “Ordered Payment”). *Id.* at 5.

While Garnishee has undertaken efforts to initiate the Ordered Liquidation and Payment in accordance with Your Honor’s directives, additional time is needed to complete this process, which requires that all trading activity within the subject brokerage account settle before the Ordered Liquidation and Payment can be completed. Merrill Lynch is therefore seeking a 10-day extension of the Ordered Liquidation, up until May 23, 2025, to provide sufficient time to allow trading activity to settle and the Liquidation process to proceed. Merrill Lynch intends to complete the Ordered Payment by the same date.

This is Merrill Lynch’s first request for an extension of the Ordered Liquidation and Payment deadline.

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The United States has consented to this proposed extension.

Respectfully submitted,

/s/ Noreen A. Kelly

Noreen A. Kelly

To: All Counsel of Record via ECF